

## Rumrill, Nancy

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**From:** Jennifer Saran <JenniferSaran@florencecopper.com>  
**Sent:** Friday, October 29, 2021 12:16 PM  
**To:** Rumrill, Nancy  
**Cc:** Brent Berg  
**Subject:** follow up items  
**Attachments:** ATT00001.txt; 2021-1029\_Attachment C\_rev7\_F.pdf; 101704\_76820\_Resp Summ (002).pdf

Hi Nancy,

As a follow up to our call yesterday, we are providing two items:

- A revised Attachment C: Part II, Section C.3.3 has been edited, and Figure C-4d has been added, to provide additional clarification regarding the neutron density logging
- Restoration schedule timeframe: the APP lists a timeframe of 6 months. There was a comment submitted by SWVP during the ADEQ public comment period regarding this timeframe: the comment and ADEQ's response are copied below, and also contained in the attached document on page 40, #68.27.

### ***SWVP Comment***

68.27. Permit Section 2.1: No explanation is provided for allowing 6 months between completion of injection and recovery and rinsing. It is not clear what is meant by "subject the availability (sic) of a sufficient number of wells to effectively rinse the mined area."

### ***ADEQ response***

*The six month period between ISCR and rinsing allows for operational flexibility. For example, the configuration of wells that are no longer actively injecting lixiviant may not be conducive to beginning rinsing operations. It's noteworthy that hydraulic control must still be maintained, but some wells may not start rinsing until there are a block of contiguous wells to make rinsing successful. Hence, the "subject to the availability" reference.*

Please let me know if you have any questions – thanks!  
Jennifer

**Jennifer Saran** Environmental, Health and Safety Manager



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